

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

JOHN WALKER, JR.,

Plaintiff,

-against-

THE CITY OF BUFFALO; THE COUNTY OF
ERIE; MICHAEL G. GUADAGNO; JOHN
MONTONDO; LINDA J. FIAL AS
EXECUTOR FOR THE ESTATE OF ROBERT
GRABOWSKI; AND MARTIN BULLOCK AS
EXECUTOR FOR THE ESTATE OF JAMES E.
HUNTER,

Defendants.

22-cv-520

**NOTICE OF PLAINTIFF'S
MOTION TO AMEND
COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Gideon Hanft, and the annexed exhibits, Plaintiff John Walker, Jr., by and through the undersigned attorneys, respectfully moves this Court for an order granting Plaintiff's motion to amend his complaint pursuant to this Court's Case Management Order, Dkt. No. 34 at ¶ 5, and Federal Rule of Civil Procedure 15(a)(2).

Dated: December 21, 2022

Respectfully submitted,

/s/ Joel B. Rudin

LAW OFFICES OF JOEL B. RUDIN, P.C.

Joel B. Rudin

David E. Rudin

Carnegie Hall Tower

152 West 57th Street, 8th Floor

New York, New York 10019

(212) 752-7600

jbrudin@rudinlaw.com
david@rudinlaw.com

/s/ Ross E. Firsenbam

WILMER CUTLER PICKERING
HALE AND DORR LLP

Ross E. Firsenbaum
Ryanne E. Perio
Gideon A. Hanft (*Pro Hac Vice*)
Phoebe Silos (*Pro Hac Vice*)
Erin Hughes (*Pro Hac Vice*)
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
ross.firsenbaum@wilmerhale.com
ryanne.perio@wilmerhale.com
gideon.hanft@wilmerhale.com
phoebe.silos@wilmerhale.com
erin.hughes@wilmerhale.com

/s/ Timothy W. Hoover

HOOVER & DURLAND LLP

Timothy W. Hoover
Spencer L. Durland
561 Franklin Street
Buffalo, NY 14202
(716) 800-2600
thoover@hooverdurland.com
sdurland@hooverdurland.com

Attorneys for Plaintiff John Walker, Jr.